

AB:MJB
F. # 2019R01366

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(T. 21, U.S.C., § 846)

RASEDUR RAIHAN,

19 MJ 929

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

PATRICK GILL III, being duly sworn, deposes and states that he is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations (“HSI”), duly appointed according to law and acting as such.

On or about October 10, 2019, within the Eastern District of New York and elsewhere, the defendant RASEDUR RAIHAN, together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute a controlled substance, which offense involved 50 grams or more of a substance containing methamphetamine, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii).

(Title 21, United States Code, Section 846)

The source of your deponent's information and the grounds for his belief are as follows:¹

1. I am a Special Agent with the Department of Homeland Security (DHS), Homeland Security Investigations (HSI) and am currently assigned to the John F. Kennedy Airport Border Enforcement Security Task Force (BEST) within the HSI New York Office. I have been employed with HSI since 2016. As part of my duties as a Special Agent with HSI, I have been trained in various aspects of law enforcement, including but not limited to, investigations involving criminal violations of Titles 8, 18, 19, 21 and other United States Code. Through my experience with narcotics investigations, I have become familiar with the behavior and activities of international drug traffickers, including their methods to ship and receive narcotics from foreign countries, to distribute those narcotics in the United States, and to avoid detection by law enforcement.

FACTS ESTABLISHING PROBABLE CAUSE

2. On or about October 2, 2019, Customs and Border Protection ("CBP") agents seized a suspicious parcel at John F. Kennedy International Airport in Queens, NY. The parcel was shipped from Bangladesh and was addressed to Mr. R. Raiyan, 114-55 145th Street, Jamaica, NY 11436 ("SUBJECT PREMISES"). A search of the parcel revealed that it contained approximately 134 grams of Methamphetamine in pill form. The package is addressed to an individual with a nearly identical last name as defendant, as their last names differ by only one letter.

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

3. During the afternoon of October 10, 2019, a postal inspector attempted to deliver the package by knocking on the front door. This attempt was unsuccessful, as no one answered the door. As a result, the postal inspector left a postal slip in the front mail slot at SUBJECT PREMISES notifying the intended recipient to contact the United States Postal Service (“USPS”) to retrieve the package.

4. At approximately 3:15 PM on October 10, 2019, RASEDUR RAIHAN arrived at USPS, located at 126-15 Foch Boulevard, Jamaica, NY and retrieved the package. In retrieving the package, RASEDUR RAIHAN stated in sum and substance that he was there for his package and handed the USPS clerk the postal slip that was previously left at SUBJECT PREMISES.

5. RASEDUR RAIHAN was arrested upon exiting the USPS.

6. Following his arrest federal agents searched SUBJECT PREMISES pursuant to a search warrant authorized by United States Magistrate Judge Peggy Kuo that had previously been signed on October 8, 2019.

7. During the search of SUBJECT PREMISES, federal agents seized approximately 50 grams of methamphetamine, packaging material, drug paraphernalia, \$778 in U.S. Currency, and a scale. Federal agents also seized several documents within SUBJECT PREMISES with defendant’s name.

8. Following his arrest, defendant was advised of his Miranda warnings and agreed to waive them and speak with law enforcement. During the post-Miranda interview, defendant admitted to residing at SUBJECT PREMISES and admitted accepting previous packages of methamphetamine. Defendant also admitted that SUBJECT PREMISES contained additional quantities of methamphetamine.

9. Based on the foregoing, I believe that RASEDUR RAIHAN engaged in conspiracy to distribute and possess with intent to distribute narcotics, in violation of Title 21, United States Code, Sections 846 and 841(b)(1)(A)(viii).

WHEREFORE, your deponent respectfully requests that the defendant RASEDUR RAIHAN be dealt with according to law.



PATRICK GILL III
Special Agent, United States Department of
Homeland Security, Homeland Security
Investigations

Sworn to before me this
11th day of October, 2019



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